

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268

Postal Rate and Fee Changes, 1997

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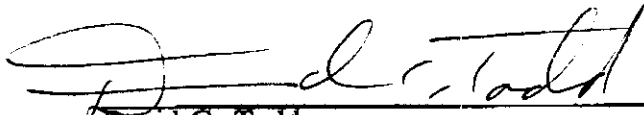
OFFICE OF THE CLERK

Docket No. R97-1

SECOND SET OF INTERROGATORIES
OF MAIL ORDER ASSOCIATION OF AMERICA
TO VAL-PAK DIRECT MARKETING SYSTEMS, INC.,
VAL-PAK DEALERS' ASSOCIATION, INC., AND
CAROL WRIGHT PROMOTIONS, INC., WITNESS
DR. JOHN HALDI (VP/CW-T-1)

Pursuant to Rules 25 and 26 of the Rules of Practice and Procedure, the Mail Order Association of America (MOAA) submits its second set of interrogatories to Val-Pak/Carol Wright (VP/CW) witness Dr. John Haldi.

Respectfully submitted,



David C. Todd
PATTON BOGGS, L.L.P.
2550 M Street, N.W.
Washington, D.C. 20037-1350
(202) 457-6000

Counsel for Mail Order Association of America

MOAA/VP/CW-T1-12

On page C-3 in Appendix C of your testimony, you state that the rates "developed for BMC dropship were rounded" in part D of Table C-2.

- a. Please confirm that the "Initial Target Rates" shown in Part C of Table C-2 for no destination entry, SCF and DDU are not utilized in the development of your proposed rates for letters. If you cannot confirm, please explain how the "Initial Target Rates" in Part C of Table C-2 impact your proposed rates.
- b. Please explain why the constructed BMC rates were chosen as the base rates from which the differentials were applied as opposed to the no destination entry, SCF or DDU rates.

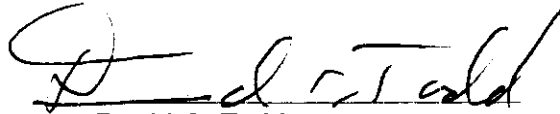
MOAA/VP/CW-T1-13

Please provide sources and all workpapers supporting the following values found in Table C-10 of your testimony:

- a. Basic rate of \$0.167 per piece:
- b. Presort discount for high density mail of \$0.017 per piece; and,
- c. Presort discount for saturation mail of \$0.012 per piece.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties requesting such service this 28th day of January, 1998.

A handwritten signature in black ink, appearing to read "D. C. Todd", written over a horizontal line.

David C. Todd
PATTON BOGGS, L.L.P.
2550 M Street, N.W.
Washington, D.C. 20037-1350
(202) 457-6000